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February 4, 2008

Ref: 8EPR-N

William Stringer, Field Manager
Bureau of Land Management
Vernal Field Office
170 South 500 East
Vernal, Utah 84078

RE: Final Environmental Impact Statement (EIS)
for Questar Exploration & Production (QEP)
Greater Deadman Bench Oil and Gas Producing
Region Field Development, CEQ #20070551

Dear Mr. Stringer:

The Region 8 Office of the Environmental Protection Agency has reviewed the Final EIS for the Greater Deadman Bench Oil and Gas Producing Region Field Development and offers the following comments for your consideration. EPA has reviewed this EIS pursuant to Section 309 of the Clean Air Act.

Proposed Action: The purpose of the proposed action is to exercise QEP's federal oil and gas leases and produce natural gas. QEP proposes to drill 1,020 natural gas wells, 219 oil/water injection wells, 169 miles of access roads, 193 miles of pipelines, 42 miles of oil pipelines, fifteen 2,000-horsepower compressor stations and 22 central tank facilities. No Tribal lands are within the project area. BLM-administered lands account for approximately 83,864 acres (85%) of surface and mineral estate lands and there are approximately 11,448 acres (12%) of surface and mineral estate lands within the area owned by the State of Utah. The remaining 3% consist of various privately owned surface and mineral estate lands. QEP currently holds leases on 79% of the federal, state, and private lands within the study area. Alternative A, the proposed action, is the only alternative considered in detail that meets the purpose and need. While the Alternative B – the No Action Alternative – was analyzed in detail, this alternative does not meet the purpose of the proposed action, which is to recover oil and natural gas on these previously leased lands.

EPA's concerns with the proposed action:

Drill locations within the Green River riparian corridor: EPA expressed environmental concerns with the impacts of a few wells and other facilities that could be located within the riparian corridor adjacent to the Green River. In response, BLM indicates that pursuant to 43 CFR 3101.1, a well pad can be relocated up to 200 meters away during the onsite survey to avoid violating this riparian policy. And since the vegetation that currently extends east from the banks of the Green River less than 200 meters in width, it is likely that moving all of the facilities 200 meters east would probably alleviate, if not eliminate, any impacts to riparian vegetation.

EPA recommendation: EPA agrees that at the time of APD review, relocating a well outside of the Green River riparian corridor can and should be done in order to accomplish the objectives of riparian area protection under the provisions of 43 CFR Part 3101. EPA requests that BLM's Record of Decision specifically commit to assurance that well pads and engineered facilities will be relocated, if necessary, to avoid this riparian area.

Range of Alternatives: The Final EIS failed to compare the proposed action to any alternative that meets the purpose of EOG exercising its existing mineral rights on these previously leased lands to develop natural gas. While the No Action Alternative was analyzed, this alternative does not meet the purpose and need. Only by providing a range of alternatives to consider in the EIS process can the decision maker have latitude in managing the development of the resource and their resulting environmental impacts. The Chapita Wells Stagecoach Final EIS lacks this basic requirement of an EIS.

EPA recommendation: Future EISs prepared by the BLM Vernal FO should include an adequate range of alternatives that meets the purpose and need.

Lack of a cumulative impact analysis for air quality: As EPA noted in its review of the Vernal RMP EIS, there is a need for a substantially updated cumulative impact assessment of air quality in the Uinta Basin. (See EPA's comment letter of May 6, 2005, from EPA to BLM Vernal Field Office.) This information could not have effectively been included at that time because important changes in ambient air quality ambient standards were made for fine particulates (PM_{2.5}) or will shortly occur for ozone (O₃) standards. The previous cumulative air quality impact analysis prepared by Spectrum Engineering and managed by BLM for the Vernal RMP EIS did not evaluate the air pollutant emissions from reasonably foreseeable development in the Basin. BLM has an obligation under NEPA to take a close hard look at the reasonably foreseeable developments, including proposed tar sands and oil shale activities that are likely in the next several decades, as well as the expansion of existing oil and gas operations regardless of whether or not an application for drilling has been submitted to your office. EPA is particularly concerned with elevated daily PM_{2.5} concentrations measured in Vernal, Utah during 2007. The air quality data for PM_{2.5} concentrations obtained from the Vernal, Utah air quality monitoring station is displayed under the heading "VL" for the period December 2006 through December 2007 in the archived files provided by the Utah Department of Environmental Quality at: <http://www.airmonitoring.utah.gov/dataarchive/archp25.htm>. While the sources of the elevated PM_{2.5} values have not been identified, emission sources from nearby natural gas

development and production activities may aggravate the apparent existing pollutant condition within Vernal.

EPA recommendation: We suggest that the Record of Decision consider this new air quality information from the Vernal monitoring station and implement additional mitigation that would reduce air emissions or phase the development over a longer time period to maintain air quality within these standards as needed to reduce the risk of adverse health impacts to Vernal area residents. While we recognize that the BLM Vernal Field Office initiated an agreement late last year with the Independent Petroleum Association of the Mountain States (IPAMS) to begin an industry-managed study of basin-wide air quality impacts, EPA has concerns with this approach. We think the information to be generated by a basin-wide air quality study will be important for future NEPA analysis and decision making by your office. Therefore, it would be useful to follow the provisions of 'third- party' contract management according to 40 CFR 1506.5(c) and have the BLM Vernal Field Office directly manage this basin-wide air quality study rather than industry.

Thank you for the opportunity to review the Final EIS on the Questar Exploration and Production Greater Deadman Bench Oil and Gas Producing Region Field Development. Please contact Weston Wilson of my staff at 303/312-6562 or me at 303/312-6004 if we can further explain our concerns.

Sincerely,

original signed by:

/s/ Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection
and Remediation

cc: Cheryl Heying, Utah Division of Air Quality
Chuck Machovic, Colorado Department of Public Health and the Environment
Jeff Sorkin, National Forest Service